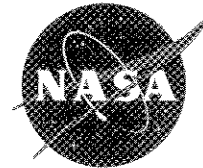


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001

March 29, 2011



Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the American Astronautical Society's (AAS) 49th Robert H. Goddard Memorial Symposium Luncheons on March 30-31, 2011

The American Astronautical Society (AAS), a non-profit organization under 501(c)(3), will host its 49th Robert H. Goddard Memorial Symposium on March 30-31, 2011, at the Greenbelt Marriott Hotel in Greenbelt, MD. The theme for this year's Symposium is "NASA: More Than You Imagine." Charles Bolden, the NASA Administrator, and John Holdren, the Science Advisor to the President, will be this year's keynote speakers. Over 400 individuals from NASA and other Federal agencies, academia, the aerospace industry, and the public will attend.

Each day of the symposium, the AAS will host a luncheon that is co-sponsored by Ball, Honeywell, USRA, CSC, Northrop Grumman, and Wyle. The guest speakers at the luncheons will be William Wrobel, the Director of Wallops Flight Facility and David Neyland, the Director of the Tactical Technology Office of the Defense Advanced Research Projects Agency. The estimated cost for food and beverages is \$35 per person for each luncheon. AAS is solely responsible for selecting, inviting, and seating of invited NASA guests. I find these events meet the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having invited NASA personnel attend the luncheons because it will further NASA programs and operations. NASA employees will have the opportunity to discuss U.S. space policy and a variety of other issues related to NASA and its programs. Accordingly, NASA employees whose duties do not substantially affect the AAS, or a majority of its members, including employees in non-career positions subject to the Ethics Pledge required by Executive Order 13490, may accept an invitation for free attendance to the AAS luncheons.

However, NASA employees whose duties may substantially affect the AAS, or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone